### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2021-336-C

		)	
Re:	Application of CenturyTel Broadband	)	
	Services, LLC ("CTBS") for a Certificate	)	PETITION TO INTERVENE
	of Public Convenience and Necessity to	)	
	Provide Competing Local Exchange,	)	
	Exchange Access and Interexchange	)	
	Telecommunications Services in the State	)	
	of South Carolina, and for Alternative	)	
	Regulation and Flexible Regulation	)	
		_	

In response to the Commission's Notice of Filing of the Application of CenturyTel Broadband Services, LLC ("CTBS") for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation, the South Carolina Telephone Coalition ('SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- 1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide

certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

/s/ Margaret M. Fox
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Attorneys for Intervenor South Carolina Telephone Coalition

November 23, 2021

Columbia, South Carolina

### **EXHIBIT A**

## South Carolina Telephone Coalition Member Companies for Purposes of Local Service Stipulation

Chesnee Telephone Company

Chester Telephone Company, d/b/a TruVista

Comporium, Inc. (f/k/a Rock Hill Telephone Company)

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium

Home Telephone ILEC, LLC d/b/a Home Telecom

Lancaster Telephone Company, d/b/a Comporium

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company (TDS)

Norway Telephone Company (TDS)

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Ridgeway Telephone Company, d/b/a TruVista

St. Stephen Telephone Company (TDS)

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company (TDS)

#### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2021-336-C

Re:	Application of CenturyTel Broadband Services, LLC ("CTBS") for a Certificate of Public Convenience and Necessity to Provide Competing Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State	) ) ) ) )	CERTIFICATE OF SERVICE
	of South Carolina, and for Alternative Regulation and Flexible Regulation	) ) _)	

I, Laura H. Diaz, Legal Practice Assistant with Burr & Forman LLP, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

Donna L. Rhaney Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Jeanne W. Stockman United Telephone Company of the Carolinas, LLC d/b/a CenturyLink 10 Parkman N 27519 Cary, NC 27519 C. Lessie Hammonds, CounselOffice of Regulatory Staff1401 Main Street, Suite 900Columbia, SC 29201

Scott Elliott Elliott & Elliott, P.A. 1508 Lady Street Columbia, SC 29201

/s/ Laura H. Diaz\_

Laura H. Diaz, Legal Practice Assistant Burr & Forman LLP Post Office Box 11390 Columbia, SC 29211

November 23, 2021 Columbia, South Carolina